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June 4, 2004

**VIA HAND DELIVERY**

Honorable Richard Collier  
General Counsel  
c/o Sharla Dillon, Docket & Records Manager  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee, 37243-0505

RE. ***Tennessee Coalition of Rural Incumbent Telephone Companies and  
Cooperatives Request for Suspension of Wireless to Wireless Number  
Portability Obligations Pursuant to Section 251(f)(2) of the Communications  
Act of 1994, As Amended  
TRA Docket No. 03-00633***

Dear Hearing Officer Collier.

Please find attached one original and thirteen (13) copies of Direct Testimony of William Christopher Jones and Direct Testimony of Gregory Curtis Cole on behalf of Celco Partnership d/b/a Verizon Wireless, which I hereby respectfully file in the above-referenced matter. Also enclosed is an additional copy of the same to be "Filed Stamped" for our records. Parties of record have been properly served as well.

If you have any questions about this filing or need any additional information, please do not hesitate to give me a call at (615) 744-8446.

Sincerely,



J. Barclay Phillips

clw

Enclosure

cc: Stephen G. Kraskin, Esq.  
Timothy C. Phillips, Esq.  
R. Dale Grimes, Esq.  
Edward Phillips, Esq.

**STATE OF TENNESSEE**  
**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

IN RE.	)	
	)	
	)	
TENNESSEE COALITION OF RURAL	)	
INCUMBENT TELEPHONE	)	Docket No. 03-00633
COMPANIES AND COOPERATIVES	)	
REQUEST FOR SUSPENSION	)	
Of Wireless To Wireless Number Portability	)	
Obligations Pursuant To Section 251(F)(2) Of	)	
The Communications Act Of 1994, As	)	
Amended	)	

**DIRECT TESTIMONY OF**  
  
**WILLIAM CHRISTOPHER JONES**  
  
**ON BEHALF OF CELLCO PARTNERSHIP D/B/A**  
  
**VERIZON WIRELESS**

June 4, 2004

**I INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is William Christopher Jones, and my business address is One Verizon Place, Mail Code: GA1B31GL, Alpharetta, Georgia 30004.

**Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

A. I am the Associate Director of State and Area Public Policy for the Southeastern Region for Verizon Wireless.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.**

A. I joined Verizon Wireless in July 2000 as part of the Bell Atlantic-GTE merger, and I am responsible for Verizon Wireless' participation in state legislative and regulatory agencies for the seven (7) southeastern states of Alabama, Florida, Georgia, Mississippi, North Carolina, South Carolina and Tennessee. From June 1996 to July 2000, I served as Manager-Legislative Matters for GTE Wireless and had responsibility for state and congressional affairs in twenty-two (22) states. Before joining GTE Wireless, I worked in various external affairs jobs for GTE Service Corporation in Irving, Texas and Washington, D. C. from 1989 until June 1996. From 1982 to 1989, I worked in various public affairs assignments for GTE Telephone Operations in Erie, Pennsylvania and in Moultrie and Dalton, Georgia. I have a journalism degree from the University of Georgia, which I received in 1973

23   **Q.   PLEASE DESCRIBE YOUR BACKGROUND IN TELECOMMUNICATIONS?**

24   A.           For the past fifteen (15) years, I have coordinated, crafted and implemented  
25           legislative and regulatory telecommunications policy in a multi-state region for  
26           telecommunications companies: Verizon Wireless, GTE Wireless, GTE Service  
27           Corporation, and GTE Telephone Operations. I have had personal interaction with  
28           legislators, public utility commissioners and their respective staffs on a wide array of  
29           issues related to the wireless telecommunications industry

30   **Q.   FOR WHOM ARE YOU TESTIFYING IN THIS PROCEEDING?**

31   A.           I am testifying on behalf of Verizon Wireless.

32   **Q.   PLEASE DESCRIBE VERIZON WIRELESS' OPERATIONS IN THE STATE OF**  
33           **TENNESSEE.**

34   A.           Verizon Wireless was formed as a joint partnership operating the U.S. wireless  
35           businesses of Bell Atlantic Corp. and GTE Corp. - now Verizon Communications, Inc.  
36           (NYSE:VZ) - and Vodafone (NYSE and LSE. VOD). Verizon Wireless' predecessor  
37           companies include Bell Atlantic Mobile, AirTouch Cellular, GTE Wireless Incorporated,  
38           PrimeCo Personal Communications, and AirTouch Paging. All wireless carriers making  
39           up Verizon Wireless, including, in Tennessee, Verizon Wireless Tennessee Partnership,  
40           do business as Verizon Wireless. Verizon Wireless owns and operates FCC licenses in  
41           the following markets in Tennessee: Chattanooga MSA, Chattanooga BTA, Clarksville-  
42           Hopkinsville MSA, Cleveland BTA, Johnson City-Kingsport-Bristol MSA, Knoxville  
43           MSA, Memphis MSA, Memphis BTA, Nashville-Davidson MSA, and Tennessee RSA  
44           Nos. 1, 2, 3, 4, 5, 6, 7, and 9. Verizon Wireless serves these markets from switches  
45           located in Knoxville, Memphis, and Nashville. Verizon Wireless operates in 94 of

Tennessee's 95 counties. Verizon Wireless provides Commercial Mobile Radio Service ("CMRS") pursuant to 47 U.S.C § 332 and Sec.13-214 of the Act. Verizon Wireless has its principal place of business at Bedminster, New Jersey. Our South Area, of which I am the Associate Director of State Public Policy, is headquartered in Alpharetta, Georgia.

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. Verizon Wireless generally objects to requests for a suspension of the duty to provide wireline-to-wireless local number portability in accordance with the requirements prescribed by the Federal Communications Commission ("FCC") in its Telephone Number Portability, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd. 23697 (2003) ("*Intermodal Porting Order*"). Specifically, Verizon Wireless has overlapping service areas and radio frequency coverage with seventeen (17) of the Applicants: Ardmore Telephone Company, Ben Lomand Rural Telephone Cooperative, Inc., Bledsoe Telephone Cooperative, CenturyTel of Adamsville, Inc., CenturyTel of Claiborne, Inc., CenturyTel of Ooltewah-Collegedale, Crockett Telephone Company, Inc., DeKalb Telephone Cooperative, Inc., Highland Telephone Cooperative, Inc., Loretto Telephone Company, Millington Telephone Company, North Central Telephone Cooperative, Inc., Peoples Telephone Company, Twin Lakes Telephone Cooperative Corporation, United Telephone Company, West Tennessee Telephone Company, and Yorkville Telephone Company. My testimony is applicable to these listed carriers and addresses the following issues:

- The Petitioners are required to offer wireline-to-wireless local number portability; and
- The Authority must follow the federal standard for granting the requested relief.

It is also my testimony that a suspension of the duty to provide wireline-to-wireless (“intermodal”) local number portability (“LNP”) in accordance with the requirements prescribed by the FCC is not in the public interest and that the availability of the LNP is in the public interest.

**II THE PETITIONERS ARE REQUIRED TO OFFER WIRELINE-TO-WIRELESS LOCAL NUMBER PORTABILITY.**

**Q. THE AMENDED PETITIONS IN THESE DOCKETS WERE FILED ON OR ABOUT MARCH 24, 2004. THE INITIAL PETITIONS WERE FILED ON OR ABOUT DECEMBER 11, 2003. HOW LONG BEFORE THAT DID THE PETITIONERS KNOW THAT THEY WOULD NEED TO PROVIDE INTERMODAL LOCAL NUMBER PORTABILITY?**

A. The Petitioners have known for years that federal law imposed local number portability obligations on them. Section 251(b)(3) of the Telecommunications Act of 1996 requires all local exchange carriers to provide local number portability. In its rules implementing the local number portability requirements of the Act, 47 C.F.R. § 52.21 – 52.33, the FCC recognized that the public interest would be served by requiring carriers, including wireless carriers, to implement local number portability in all areas, but conditioned the requirement to implement local number portability on a carrier receiving a bona fide request (“BFR”) from another carrier

On June 27, 1996, the FCC issued its First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352 (1996) (“*First Report and Order on Local Number Portability*”), which adopted the rules necessary to implement the LNP statutory

94 mandate. In paragraph 3 of the *First Report and Order on Local Number Portability*, the  
95 FCC reiterated that “number portability must be provided in these areas by all LECs to all  
96 telecommunications carriers, including commercial mobile radio services (CMRS)  
97 providers.”

98 The FCC’s intermodal LNP rules have a long history, complete with multiple  
99 challenges to the rules at the FCC and in the Court of Appeals for the D.C. Circuit. At  
100 every turn, the FCC defended federal pro-competitive and pro-consumer policies  
101 underpinning the LNP rules, including expansion of the mandate to include wireless  
102 carriers. Intermodal porting has consistently been used as justification for retaining the  
103 LNP obligation for wireless carriers. After extending the timeline for intermodal and  
104 wireless-to-wireless local number portability, in July 2002, the FCC, in its *Intermodal*  
105 *Porting Order*, required wireless participation in local number portability by November  
106 24, 2003. Therefore, all of the Petitioners should have known about and begun preparing  
107 for intermodal local number portability. Despite the fact that the FCC had given the  
108 industry years to get ready, the FCC gave rural carriers, such as the Petitioners, an  
109 additional six months until May 24, 2004 to prepare for wireline-to-wireless local number  
110 portability.

111 **Q. ARE THE PETITIONERS REQUIRED BY THE FCC TO OFFER**  
112 **INTERMODAL LOCAL NUMBER PORTABILITY?**

113 **A.** Yes. But for the Authority’s May 17, 2004, Order Granting Motion for  
114 Suspension Pending Proceeding, all of the Petitioners would have been required by the  
115 FCC’s *Intermodal Porting Order* to provide wireline-to-wireless local number portability  
116 on May 24, 2004. The FCC recognized that the public interest would be served by

117 requiring carriers to implement local number portability in all areas, but conditioned the  
118 requirement to implement local number portability on a carrier receiving a BFR from  
119 another carrier.

120 **Q. HAS VERIZON WIRELESS SENT A BFR TO EACH OF THE PETITIONERS**  
121 **REQUESTING THE IMPLEMENTATION OF LNP?**

122 A. Verizon Wireless has submitted BFRs to the seventeen (17) Petitioners in this  
123 Docket that I referred to earlier in my testimony. Some of these BFRs were sent out as  
124 early as May of 2003. Verizon Wireless' requests to implement wireline-to-wireless  
125 local number portability provided the Petitioners with (6) months or more notice to  
126 implement intermodal local number portability. Despite the fact that some of the BFRs  
127 were issued in May of 2003, some of the Petitioners waited up to six (6) months after  
128 receipt of said BFRs to ask the Authority for a suspension of their intermodal local  
129 number portability obligations and the Petitioners failed to serve Verizon Wireless with  
130 their Petitions.

131  
132 **III THIS AUTHORITY MUST FOLLOW THE FEDERAL STANDARD FOR**  
133 **GRANTING THE REQUESTED RELIEF.**

134  
135 **Q. WHAT IS THE STANDARD FOR GRANTING THE PETITIONERS'**  
136 **REQUESTS FOR SUSPENSION OF THEIR LNP OBLIGATIONS?**

137 A. Section 251(f)(2) of the Act permits state commissions to suspend a carrier's LNP  
138 obligations only:

139 to the extent that, and for such duration as, the State commission  
140 determines that such suspension or modification —  
141 (A) is necessary: (i) to avoid significant adverse impact on users

of telecommunications services generally; (ii) to avoid imposing a requirement that is unduly economically burdensome, or (iii) to avoid imposing a requirement that is technically infeasible; and (B) is consistent with the public interest, convenience, and necessity.

According to the FCC in its 1996 Local Competition First Report and Order, 11 FCC Rcd. 15499, paragraph 1262, (“*Local Competition Order*”), “Congress intended exemption, suspension, or modification of the section 251 requirements to be the exception rather than the rule . [the FCC] believes that Congress did not intend to insulate smaller or rural LECs from competition.” Further in codifying its interpretation of Section 251(f)(2), 47 C.F.R. 51.405(d) of the FCC’s rules states:

In order to justify a suspension or modification under section 251(f)(2) of the Act, a LEC must offer evidence that the application of section 251(b) or section 251(c) of the Act would be likely to cause undue economic burden beyond the economic burden that is typically associated with efficient competitive entry.

In paragraph 168 of the *First Report and Order on Local Number Portability*, which as I indicated previously, is the very order in which the FCC first adopted its LNP rules, the FCC articulated the federal standard it would apply to requests to extend the LNP deadline. The FCC stated that to support a request for suspension of the LNP obligation, a carrier must show through “substantial credible evidence” why it cannot meet the scheduled LNP deployment, and provide a detailed explanation of the activities the carrier undertook before requesting an extension.

**Q. HOW, THEN, SHOULD THIS AUTHORITY DETERMINE WHETHER OR NOT TO SUSPEND THE PETITIONERS’ WIRELINE-TO-WIRELESS LOCAL NUMBER PORTABILITY OBLIGATIONS?**

168           A.           The Authority should give substantial deference to the FCC's  
169 interpretation of this important federal mandate. The FCC denied requests from  
170 Yorkville Telephone Cooperative and Yorkville Communications; TMP Corp. and TMP  
171 Jacksonville, LLC, and Choice Wireless, LC which sought relief for their wireless  
172 operations, CC Docket No. 95-116, DA 04-1455, paragraph 1, May 24, 2004 ("*Yorkville*  
173 *et al. Order*") on the grounds that the petitioners failed to demonstrate that special  
174 circumstances exist to warrant an extension of the porting deadline and because the  
175 requests would not serve the public interest. The FCC concluded that petitioners failed to  
176 demonstrate that the technical readiness issues they cited as the basis for their waiver  
177 requests could not have been prevented had petitioners made timely efforts to prepare for  
178 porting. The FCC noted at paragraph 8 of the *Yorkville et al. Order* that certain of the  
179 petitioners had only recently begun efforts to prepare for porting. In view of the extended  
180 amount of lead-time available to prepare for porting, the FCC found that it was  
181 reasonable to expect that petitioners should have taken steps to ensure their technical  
182 readiness at an earlier time

183           Likewise, in its Order denying a request by a wireline carrier, North-Eastern  
184 Pennsylvania Telephone Company, CC Docket No. 95-116, DA 04-1312, May 13, 2004,  
185 ("*NEP Order*") the FCC denied the petition for a extension of the May 24, 2004,  
186 implementation deadline. In paragraph 10 of the *NEP Order*, the FCC concluded that  
187 extending the porting deadline in order to accommodate petitioner's switch delivery and  
188 deployment schedule and to provide additional time to resolve service feature issues was  
189 not warranted, as the petitioner had failed to present extraordinary circumstances beyond  
190 its control.

191 **Q. HAS THE FCC GIVEN STATE COMMISSIONS ANY FURTHER GUIDANCE**  
192 **REGARDING REQUESTS FOR SUSPENSIONS OF WIRELINE-TO-WIRELESS**  
193 **LOCAL NUMBER PORTABILITY?**

194 A. Yes they have. In a May 6, 2004, letter to Commissioner Stan Wise, President of  
195 the National Association of Regulatory Utility Commissioners, the FCC's Chief of the  
196 Consumer & Governmental Affairs Bureau, K. Dane Snowden, outlined how the FCC  
197 views such Petitions. Mr. Snowden wrote:

198 "I hope that you . . . will encourage state commissions to hold  
199 carriers that seek waivers of their porting obligations to the  
200 appropriate standard of review. At this point, I understand that  
201 many rural wireline carriers have sought waivers of their  
202 obligations, and that, in some cases, waivers have been granted.  
203 Of course, states have jurisdiction to waive porting obligations for  
204 certain rural telephone companies under Section 251(f) of the  
205 Telecommunications Act of 1996, where carriers demonstrate  
206 undue economic burden or technological infeasibility. I think we  
207 can agree that the State commissions should strictly apply that  
208 statutory standard so that the rights of consumers are protected. I  
209 encourage the State commissions to ensure that carriers seeking  
210 waivers demonstrate that they are on a path to compliance so that  
211 customers of these carriers will not be forever denied the rights  
212 their fellow consumers enjoy. If relief were to be granted in the  
213 absence of extraordinary circumstances, or for indefinite periods, it  
214 would be a setback for rural consumers. It should be noted that  
215 some of the same carriers that now seek to have their porting  
216 obligations waived have long known that they would, absent a  
217 demonstration of undue burden, be required to provide porting to  
218 both wireline and wireless carriers.

219 **Q. WILL A DELAY IN WIRELINE-TO-WIRELESS LOCAL NUMBER**  
220 **PORTABILITY SAVE ANY LOCAL NUMBER PORTABILITY**  
221 **INVESTMENTS?**

222 A. No. The investments required by the Petitions will not be reduced by delaying  
223 their obligation to implement wireline-to-wireless local number portability. A delay only  
224 serves to deny (1) those competitive carriers that have made local number portability

investments the opportunity to leverage that investment in the Petitioners' serving areas,  
and (2) customers the opportunity to port their numbers.

**Q. HAS VERIZON WIRELESS MADE THE INVESTMENTS NECESSARY TO  
PROVIDE LNP IN TENNESSEE?**

A. Yes. We have upgraded our network, implemented new processes, systems, and  
hired supporting resources to implement wireline-to-wireless local number portability in  
Tennessee and throughout the nation. Verizon Wireless also built a state of the art  
porting center in Mufreesboro, Tennessee. We believe it is unfair that carriers that are  
similarly obligated, would be exempted from their obligations. This will limit Verizon  
Wireless' ability to recoup the wireline-to-wireless local number portability investments  
we have made by restricting our opportunity to offer wireline-to-wireless local number  
portability to the Petitioners' customers.

**Q TO YOUR KNOWLEDGE, HAVE ANY OF THE PETITIONERS MADE  
INVESTMENTS TO BECOME LNP CAPABLE?**

A. Yes, that is what is so confounding about some of the requests for suspension.  
From the discovery responses as well as responses to data requests from the TRA,  
several petitioners are LNP capable in all or part of their networks today – or will be  
soon. For example, Exhibit A to the Amended Petition for Suspension, as amended by  
the May 19, 2004 Statements in Support of Projected Date of Local Number Portability  
Technical Capacity, reveals the following

1. The following Petitioners will be LNP capable on or before May  
24, 2004: Ben Lomand Rural Telephone Cooperative, Inc., CenturyTel of  
Adamsville, CenturyTel of Claiborne, Inc CenturyTel of Ooltewah-  
Collegedale, Humpreys County Telephone Company, Loretto Telephone  
Company, Inc., North Central Telephone Cooperative, Inc., Tellico  
Telephone Company, Inc.; Twin Lakes Telephone Cooperative Corp.,

United Telephone Company, and Yorkville Telephone Cooperative  
(possibly moved to July 31, 2004)

2. The following Petitioners will be LNP capable on or before August 24, 2004: Highland Telephone Cooperative, Inc., and Millington Telephone Company.

Apparently, these carriers have other reasons not grounded in the statutory criteria for making the request for suspension – particularly since they have already made the investments necessary in their networks to become LNP capable.

**Q. WHAT STANCE HAS THE FCC STAFF TAKEN WITH RESPECT TO THE PETITIONERS' POSITIONS?**

A The FCC staff has indicated that the volume of actual number porting would not be the measure of success, but giving customers the option to port was most important. Carriers outside of the 100 largest MSA's should have been testing and preparing for the May 24, 2004 LNP deadline. The FCC's conclusion in the *Intermodal Porting Order* is that rating and routing issues between carriers are not porting issues and are therefore not a valid reason for refusing to port.

**IV CONCLUSION**

**Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

The Authority should reject the Petitioners' arguments for delayed implementation beyond the already granted sixty-day (60) day interim suspension, deny the Petitions, and establish an expedited date by which the Petitioners should implement wireline-to-wireless local number portability. Given the sixty-day (60) interim suspension already granted by the Authority to July 23, 2004, the expedited date for

278 implementation should not exceed thirty (30) days from the expiration of the sixty-day  
279 (60) interim suspension.

280 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

281 **A.** Yes, it does. Thank you.

**STATE OF TENNESSEE**  
**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

IN RE:	)	
	)	
	)	
TENNESSEE COALITION OF RURAL	)	
INCUMBENT TELEPHONE	)	Docket No. 03-00633
COMPANIES AND COOPERATIVES	)	
REQUEST FOR SUSPENSION	)	
Of Wireless To Wireless Number Portability	)	
Obligations Pursuant To Section 251(F)(2) Of	)	
The Communications Act Of 1994, As	)	
Amended	)	

**DIRECT TESTIMONY OF**  
**GREGORY CURTIS COLE**  
**ON BEHALF OF CELLCO PARTNERSHIP D/B/A**  
**VERIZON WIRELESS**

June 4, 2004

**I INTRODUCTION**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Gregory Curtis Cole and my business address is 8921 Research Drive,  
Charlotte, North Carolina 28262.

**Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

A I am the Network Transport Planning Manager for the South Area for Verizon Wireless.

**Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND BUSINESS EXPERIENCE.**

A. I joined Verizon Wireless in April 2000 as part of the Bell Atlantic-Vodafone/AirTouch Cellular merger, and I am responsible for transport planning and phone number administration for thirteen (13) states, which includes Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, and Texas. From December 1994 to April 2000, I served as a network systems engineer for AirTouch Cellular and had responsibility for the transport design of the Atlanta, Georgia market. Before joining AirTouch Cellular, I served as systems engineer with Communications International, Inc. in Norcross, Georgia from 1990 until October 1992. From October 1992 to May 1993, I worked as a contract engineer with Scientific Atlanta in Norcross GA. From May 1993 to October 1994, I served as the engineering manager for Communications International, Inc. I have an electrical engineering technology degree from the Southern College of Technology, which I received in 1990.

**Q. PLEASE DESCRIBE YOUR DAILY RESPONSIBILITIES AS A NETWORK  
TRANSPORT PLANNING MANAGER FOR VERIZON WIRELESS.**

A. My primary, daily responsibilities are Transport Planning and Telephone Number Inventory Management. For Transport Planning, my duties involve the management of four (4) engineers, planning and design of fixed networks and interconnect, fixed network contract negotiations and execution, execution of interconnect contracts, project management, and LNP support, which includes implementation, testing, and troubleshooting. For Telephone Number Inventory, my duties include the management of five (5) telephone numbers administrators, ordering both initial and growth NPA/NXX's, tracking and forecasting telephone number utilization and exhaust, telephone number pooling implementation, and LNP support, which includes ordering and setting-up MIN resources, rate center routing design, LRN requests/assignment, and troubleshooting

**Q. FOR WHOM ARE YOU TESTIFYING IN THIS PROCEEDING?**

A. I am testifying on behalf of Verizon Wireless

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. Verizon Wireless generally objects to requests for a suspension of the duty to provide wireline-to-wireless ("intermodal") local number portability ("LNP") in accordance with the requirements prescribed by the Federal Communications Commission ("FCC") in its *Telephone Number Portability*, Memorandum Opinion and Order and Further Notice of Proposed Rulemaking, 18 FCC Rcd. 23697 (2003) ("*Intermodal Porting Order*"). Specifically, Verizon Wireless has overlapping service areas and radio frequency coverage with seventeen (17) of the Petitioners: Ardmore Telephone Company; Ben

46 Lomand Rural Telephone Cooperative, Inc., Bledsoe Telephone Cooperative; CenturyTel  
47 of Adamsville, Inc.; CenturyTel of Claiborne, Inc.; CenturyTel of Ooltewah-Collegedale,  
48 Inc; Crockett Telephone Company, Inc.; Dekalb Telephone Cooperative, Inc.; Highland  
49 Telephone Cooperative, Inc.; Loretto Telephone Company; Millington Telephone  
50 Company; North Central Telephone Cooperative Inc ; Peoples Telephone Company;  
51 Twin Lakes Telephone Cooperative Corp.; United Telephone Company; West Tennessee  
52 Telephone Company; and Yorkville Telephone Company.

53  
54 **II VERIZON WIRELESS IS READY TO PROCEED WITH INTERMODAL**  
55 **LOCAL NUMBER PORTABILITY IN AREAS SERVED BY 18**  
56 **PETITIONERS**

57  
58 **Q. HAS VERIZON WIRELESS MADE THE INVESTMENTS NECESSARY TO**  
59 **PROVIDE LNP IN TENNESSEE?**

60 A. Yes We have upgraded our network, implemented new processes, systems, and hired  
61 supporting resources, including a large, state-of-the-art port center located in  
62 Mufreesboro, Tennessee, to implement wireline-to-wireless local number portability in  
63 Tennessee and throughout the nation. Specifically, Verizon Wireless prepared for  
64 intrermodal porting in the top 100 markets by November 24, 2003 and in all other  
65 markets by May 24, 2004.

66 **Q. CAN YOU DESCRIBE VERIZON WIRELESS'S EFFORTS TO BECOME LNP**  
67 **CAPABLE IN DETAIL?**

68 A. Yes, I was very involved in that effort Basically, LNP capability entails changes and  
69 upgrades to a carrier's network to enable it to offer the LNP service, *i.e.*, porting with

70 other wireless and wireline carriers. These changes are also necessary for participation in  
71 thousands-block number pooling. Both are based on implementing the Local Routing  
72 Number (“LRN”) technological platform in the network. In order to become LNP  
73 capable, Verizon Wireless performed software upgrades to its switches; changed switch  
74 translations; secured LRNs, separated the Mobile Directory Number parameter (“MDN”)  
75 from the Mobile Identification Number parameter (“MDN”)(this is a requirement for  
76 wireless carriers only); implemented a rate center mapping database for call routing;  
77 prepared its billing systems to support LNP and MIN/MDN separation; obtained MIN  
78 resources (requirement for wireless carriers only); created various databases to support  
79 LNP in its billing, phone number inventory, and point of sales systems. Verizon Wireless  
80 tested “ported in” and “ported out” numbers with other carriers to ensure both our  
81 systems and theirs were functioning correctly. Finally, Verizon Wireless converted its  
82 Type 1 numbers to Type 2 numbers, so customers that did choose to “port out” would  
83 have an easier time completing the LNP process with the other carrier. Verizon Wireless  
84 was very focused on ensuring that the customer experience with its porting processes was  
85 positive, regardless of whether the customer was porting into or away from Verizon  
86 Wireless.

87 **Q. IS THERE A DIFFERENCE BETWEEN TECHNICAL LNP CAPABILITY IN**  
88 **THE NETWORK AND OFFERING THE LNP SERVICE COMMERCIALLY?**

89 **A.** Yes, LNP capability refers to network readiness whereas the LNP service entails offering  
90 customers the ability to port. The FCC refers to LNP as the ability to retain one’s  
91 telephone number when porting, the LNP service includes implementing the LNP  
92 capability (or more appropriately, the LRN capability) in the network and any other

93 system changes necessary to provision the service. In addition to the changes described  
94 above, in order to offer the LNP service by November 24, 2003, Verizon Wireless  
95 prepared its business and sales operations for LNP.

96 **Q. TO YOUR KNOWLEDGE, HAVE ANY OF THE PETITIONERS MADE**  
97 **INVESTMENTS TO BECOME LNP CAPABLE IN THEIR NETWORKS?**

98 A Yes. From the discovery responses, several petitioners are LNP capable in all or part of  
99 their networks today – or will be soon. Specifically, the following carriers have provided  
100 the following information: All CenturyTel TN switches have been equipped with LNP  
101 functionality (hardware/ software) as of May 24, 2004; Dekalb Telephone Cooperative,  
102 Inc. had an LNP capable switch ordered, delivered and installed – but, without  
103 explanation, is waiting to “turn up” the switch on October 1, 2004; Highland Telephone  
104 Cooperative, Inc. states that its Nortel switch software release will complete testing by  
105 June 15, 2004; Loretto has installed LNP software into a central office and has a  
106 completion date of April 30, 2004 for LNP software for switches, and Yorkville states  
107 that its vendors are trying to get all upgrades and translations by the May 24, 2004  
108 deadline. These carriers have already made the investments necessary in their networks  
109 to become LNP capable and cannot claim technical infeasibility. As a technical matter,  
110 they should be able to port today. Many of the operational details that Verizon Wireless  
111 had to surmount to ensure smooth transition to providing the LNP service have been  
112 worked out. Verizon Wireless has developed. (1) a service level agreement (“SLA”)  
113 template to settle issues associated with inter-carrier communication and business rules  
114 and (2) trading partner profile (“TPP”) for exchanging critical information between  
115 carriers.

116 **Q. HAS VERIZON WIRELESS MADE ANY EFFORTS, APART FROM THE BFRs,**  
117 **TO REACH OUT TO CARRIERS FOR THE PURPOSE OF PROVISIONING**  
118 **INTERMODAL LNP?**

119 A Yes. Verizon Wireless has made multiple contacts and overtures to the Petitioners. In  
120 addition to the BFRs, Verizon Wireless has sought to execute SLAs with Petitioners,  
121 exchange TPPs, and has sent other correspondence. In all instances, including the BFR,  
122 Verizon Wireless has made at least three (3) attempts to contact Petitioners regarding  
123 LNP, indicating our desire to port customers between our companies.  
124

125 **III CONCLUSION**

126 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

127 The Commission should reject the Petitioners' arguments for delayed implementation,  
128 deny the Petitions, and establish an expedited date by which the Petitioners should  
129 implement wireline-to-wireless local number portability.  
130

131 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

132 A. Yes, it does. Thank you.

**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2004, a copy of the foregoing document was served by U.S. mail on the parties of record.

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